

2008 Jun 10 AM 09:53

CLERK U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELANDUnited States Bankruptcy Court  
Northern District of Ohio

Melissa A Marflak

Debtors,

}	Chapter 13
}	Case #: 07-18755
}	Judge Harris
}	
}	<b><u>MOTION TO REINSTATE</u></b>
}	<b><u>SECTION 362 AUTOMATIC STAY</u></b>
}	<b><u>WITH RESPECT TO DEUTSCHE</u></b>
}	<b><u>BANK NATIONAL TRUST COMPANY</u></b>
}	
}	

The Debtor, Ms. Marflak, by and through counsel, Alexander V. Sarady respectfully move this court to reinstate the automatic stay which was terminated by an Affidavit of Default and the subsequent Order Granting the creditor's Motion for Relief From Stay. The Affidavit of Default filed by Deutsche Bank National Trust Company alleged that the Debtor was not current with her post petition payments. Debtor will have the funds necessary to cure the default at the time of the hearing.

WHEREFORE, Debtor prays that this motion to reinstate the automatic stay be granted and that section 362 automatic stay be imposed on Deutsche Bank National Trust Co..

Respectfully Submitted,

/s/Alexander V. Sarady  
 Alexander V. Sarady (0075500)  
 614 W. Superior Ave.  
 Suite 950  
 Cleveland, Ohio 44113  
 (216) 263-6200

**CERTIFICATE OF SERVICE:**

A copy of this **Motion to Reinstate Section 362 Automatic Stay** was mailed by regular United States mail postage prepaid on 9th day of June, 2008 to the following:

**Debtor:**

Ms. Marflak  
7333 Parma Park Blvd.  
Parma, OH 44130

**Debtor's Attorney:**

Alexander V. Sarady  
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Cleveland, Ohio 44113

**Creditor's Attorney:**

Stacey O'Stafy  
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**Chapter 13 Trustee:**

Craig Shopneck  
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Suite 3860  
Cleveland, Ohio 44114-2321

/s/Alexander V. Sarady

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